

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Michael Méndez-Rodríguez v. Francisco González-Cruz

Méndez-Rodríguez · No. 25-cv-1000 (MAJ) · Decided December 19, 2025

SUMMARY

The United States District Court for the District of Puerto Rico entered default judgment for Michael Méndez-Rodríguez against police officer Francisco González-Cruz on an excessive-force claim under the Fourth Amendment and 42 U.S.C. § 1983. The court awarded \$13,640.92 in compensatory damages for lost income and \$68,200.00 in punitive damages, for a total judgment of \$81,840.92. The opinion and order was issued after an evidentiary hearing on damages.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	María Antongiorgi-Jordán
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	December 19, 2025
DOCKET	25-cv-1000 (MAJ)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging that a Puerto Rico police officer used excessive force in violation of the Fourth Amendment. After the defendant failed to answer or otherwise appear, the clerk entered default. Following an evidentiary hearing on damages, the district court entered default judgment for plaintiff.
STANDARD OF REVIEW	The court applied the Rule 55 default-judgment framework and determined damages based on the admitted well-pleaded allegations and uncontested hearing evidence. Fourth Amendment excessive-force claims are evaluated under objective reasonableness, and punitive damages are subject to the constitutional gross-excessiveness limitations of the Due Process Clause.
PRECEDENTIAL VALUE	Unpublished district court opinion; precedential status unknown
PARTIES	Michael Méndez-Rodríguez v. Francisco González-Cruz

TOPICS

default judgment

section 1983

police misconduct

constitutional law

damages

PRACTICE AREAS

Civil procedure

Civil rights

Constitutional law

Damages

QUESTIONS PRESENTED

1. Whether default judgment should be entered after defendant failed to answer or otherwise defend.
2. Whether the admitted allegations and uncontested evidence established that defendant used excessive force in violation of the Fourth Amendment and 42 U.S.C. § 1983.
3. Whether plaintiff was entitled to compensatory damages and, if so, in what amount.
4. Whether defendant's conduct supported punitive damages under Section 1983 and whether the requested award was constitutionally permissible.

HOLDINGS

1. Because defendant failed to plead or otherwise defend and default was entered, the well-pleaded factual allegations were deemed admitted, and the court could enter default judgment after determining damages.
2. Defendant's conduct in striking plaintiff with a police cruiser three consecutive times, without probable cause or reasonable suspicion for a stop and without circumstances justifying such force, was objectively unreasonable and violated plaintiff's Fourth Amendment rights.
3. Plaintiff was entitled to \$13,640.92 in compensatory damages for lost wages, but the record did not support additional compensatory damages.
4. Defendant's repeated, dangerous, and unjustified use of the police cruiser, together with his taunting and attempt to shift blame, showed evil motive or reckless or callous indifference sufficient to support punitive damages. A five-to-one ratio was warranted, resulting in \$68,200 in punitive damages.

KEY QUOTATIONS

"The Court therefore finds that Defendant's conduct was grossly unreasonable." (IV.a)

"Therefore, the Court finds that Defendant employed excessive force in violation of Plaintiff's Fourth Amendment constitutional rights." (IV.a)

"For the reasons stated throughout this Opinion and Order, the Court hereby GRANTS default judgment to Plaintiff in the amount of \$81,840.92." (V. Conclusion)

FACTUAL BACKGROUND

On January 5, 2024, plaintiff was riding his motorcycle on Route 66 in Carolina, Puerto Rico, when defendant, a Puerto Rico police officer, struck him with a police cruiser three times. The third collision caused plaintiff to lose control, crash, and suffer fractures, lacerations, contusions, and road rash requiring hospital treatment and physical therapy. Plaintiff was unable to work for several months and established a \$13,640.92 reduction in

income. Defendant also cursed and taunted plaintiff and attempted to have him state on the body camera that he was responsible for the collision.

PROCEDURAL HISTORY

Defendant was served on February 28, 2025, but did not answer or otherwise plead. The clerk entered default on March 31, 2025. At plaintiff's request, the court held an evidentiary hearing on August 12, 2025, and then granted default judgment in the amount of \$81,840.92.

DISPOSITION

other

CASES CITED

- Rodríguez-Rodríguez v. BCBG Max Azria Group, LLC, 18-cv-1075, 2021 WL 10364588, at *5 (D.P.R. Sept. 23, 2021)
- Díaz v. Department of Education, 09-cv-1564, 2013 WL 2389822, at *2 (D.P.R. May 17, 2013)
- Ortiz-González v. Fonovisa, 277 F.3d 59, 64 (1st Cir. 2002)
- Rivera-García v. Román-Carrero, 938 F. Supp. 2d 189, 196-97 (D.P.R. 2013)
- Graham v. Connor, 490 U.S. 386, 394-95, 397 (1989)
- Rodríguez-García v. Miranda-Marín, 610 F.3d 756, 768 (1st Cir. 2010)
- Plumhoff v. Rickard, 572 U.S. 765, 774 (2014)
- United States v. Cruz-Rivera, 14 F.4th 32, 43 (1st Cir. 2021)
- Scott v. Harris, 550 U.S. 372, 382 (2007)
- Tennessee v. Garner, 471 U.S. 1 (1985)
- Lawless v. Town of Freetown, 63 F.4th 61, 65 (1st Cir. 2023)
- Healy v. Martínez, 18-cv-1754, 2022 WL 18861859, at *13 (D.P.R. May 26, 2022)
- Cooper Industries, Inc. v. Leatherman Tool Group, Inc., 532 U.S. 424, 432 (2001)
- Méndez-Matos v. Municipality of Guaynabo, 557 F.3d 36, 47-49, 52, 55-56 (1st Cir. 2009)
- Smith v. Wade, 461 U.S. 30, 56 (1983)
- Iacobucci v. Boulter, 193 F.3d 14, 26-27 (1st Cir. 1999)
- Kolstad v. American Dental Association, 527 U.S. 526, 535-36 (1999)
- State Farm Mutual Automobile Insurance Co. v. Campbell, 538 U.S. 408, 416-17, 419, 424-26 (2003)
- BMW of North America, Inc. v. Gore, 517 U.S. 559, 574-75, 581, 583 (1996)
- Pacific Mutual Life Insurance Co. v. Haslip, 499 U.S. 1, 23-24 (1991)
- Casillas-Díaz v. Palau, 463 F.3d 77, 86 (1st Cir. 2006)